

EXHIBIT T

SUPERIOR COURT OF WASHINGTON FOR KING COUNTY

BLC WATER COMPANY, LLC, INDIANA
WATER TECHNOLOGY, LLC,
COLEWSTECH, LLC, RCWSTECH 1157,
LLC, ROYAL RESERVOIRS, LLC,
CHAURISHI RETAIL ENTERPRISES, LLC,
KDAWG CRYPTO, LLC, PACIFIC WATER
TECHNOLOGY, LLC, KWANSOO LEE,
DDS, PLLC, KWANSOO LEE, BRIAN CHU,
BRIAN CHU DDS, INC., LARINA CHU,
LAURINA CHU DDS, INC., BRIAN AND
LAURINA CHU DDS, INC., DAVID
SCHROEDER, SARAH SCHROEDER, RON
COLE, KAREN LAVIN, BASANT KUMAR,
DEREN FLESHER, TYLER SADEK,
NATALIE SADEK, AND FOUNDERS
MOSAIC PARTNERS, LLC,

Plaintiffs,

v.

FIRST FED BANK, FIRST NORTHWEST
BANCORP, NORMAN TONINA, CRAIG
CURTIS, JENNIFER ZACCARDO, CINDY
FINNIE, DANA BEHAR, MATTHEW
DEINES, SHERILYN ANDERSON,
GABRIEL GALANDA, LYNN
TERWOERDS, JOHN DOES 1-10,

Defendants.

No. 24-2-20247-1 SEA

**PLAINTIFFS' FIRST REQUESTS FOR
PRODUCTION TO FIRST FED BANK
AND FIRST NORTHWEST BANCORP**

RELATED CASES:

No. 24-2-12567-1 SEA

No. 24-2-19871-7 SEA

No. 24-2-10753-3 SEA

No. 24-2-08418-5 SEA

1 Pursuant to Civil Rules 26, 33 and 34, Plaintiffs hereby propounds their First
2 Interrogatories and Requests for Production (“Discovery Requests”) to Defendant First Fed
3 Bank and First Northwest Bancorp (“you” or “your”).

4 **INSTRUCTIONS**

5 1. These requests are directed to you and cover all information in your possession,
6 custody, and control, including information in the possession, custody, and control of
7 Defendant, including without limitation your current or former officers or directors,
8 employees, agents, servants, representatives, your attorneys, or other persons directly or
9 indirectly employed or retained by you, or anyone else acting on your behalf or otherwise
10 subject to your control, and any merged, consolidated, or acquired predecessor or successor,
11 parent, subsidiary, division or affiliate.

12 2. Unless otherwise specifically provided herein, the documents that must be
13 produced in response to the following requests for production include all responsive
14 documents prepared, sent, dated, received, used, or in effect at any time during the period of
15 January 1, 2015 through the present, including the date of any supplemental response (“the
16 discoverable period”).

17 3. Use of the singular or plural in these requests should not be deemed a limitation
18 and the use of the singular should be construed to include, where appropriate, the plural. The
19 conjunctive form “and” and the disjunctive form “or” are mutually interchangeable and
20 encompass each other. The terms “any” and “all” are mutually interchangeable and encompass
21 each other.

22 4. Plaintiffs request that any documents withheld in whole or in part from
23 production based on a claim of privilege are assigned unique document control numbers; and
24 each attachment to a document shall be treated as a separate document and separately logged,
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1 if withheld, and cross referenced, if produced. Please also provide a statement of the claim of
2 privilege and all facts relied upon in support of the decision to withhold each document, in the
3 form of a log, which, for each document withheld, states:

- 4 a. The document's control numbers;
- 5 b. All authors of the document;
- 6 c. All addressees of the document;
- 7 d. All recipients of the document, or of any copies of the document to the
8 extent not included among the document's addressees;
- 9 e. The date of the document;
- 10 f. The nature or type of the privilege that you are asserting for the document
11 (*e.g.* "attorney-client privilege");
- 12 g. A description of the subject matter of the document, describing the
13 nature of the document in a manner that, while not revealing information
14 that is itself privileged, provides sufficiently detailed information to
15 enable Plaintiff to assess the applicability of the privilege claimed;
- 16 h. The request to which the document is responsive;
- 17 i. The document control numbers of any attachments to the document,
18 regardless of whether any privilege is being asserted for such
19 attachments; and
- 20 j. Whether the document has been produced in partially redacted form or
21 withheld entirely.

22 5. The definition of "document" used herein includes data stored in any electronic
23 form. You are required to review such data and determine whether it contains material
24 responsive to these requests. If you have not already done so, you should immediately take all
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1 steps necessary to preserve the following categories of electronic data that contain information
2 responsive to Plaintiff's discovery requests:

- 3 a. All electronic mail, information about electronic mail (including but not
4 limited to information on message contents, header information, and logs
5 of electronic mail system usage), any attachments, and any other
6 electronic communications including any data from instant messaging
7 programs, internet relay chat systems, or any voicemail programs
8 containing information responsive to these requests;
- 9 b. All files containing information from electronic calendars or scheduling
10 programs responsive to these requests;
- 11 c. All user-created files (including but limited to word processing files,
12 spreadsheets, and slide presentations) that contain information
13 responsive to these requests;
- 14 d. All databases (including all records and fields and structural information
15 in such databases) or other data files that contain any information (such
16 as sales, pricing, customer, financial, accounting, and billing
17 information) responsive to these requests;
- 18 e. All logs of activity on computer systems that may have been used to
19 process or to store electronic data containing information responsive to
20 these requests;
- 21 f. All electronic data files created or used by spreadsheet programs that
22 contain information responsive to these requests; and
- 23 g. All other electronic data containing information that is responsive to
24 these requests.
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1 6. Unless otherwise requested, electronic documents (e.g., email) and data shall be
2 produced in searchable electronic format as follows:

- 3 a. Unless otherwise stated, the requested production format for all
4 documents is single page TIFF images with multi-page text files, load
5 files and native links. The load file should be produced in a format
6 capable of being imported into Relativity litigation software. The
7 parties may confer on specific metadata fields and may agree to a
8 different form of production. In all cases, however, you should
9 produce documents in native format, or such other format upon which
10 the parties mutually agree, and, in all cases, preserving original
11 metadata and source information;
- 12 b. All image files should include an OCR text file;
- 13 c. All files should be labeled with a Bates or control number;
- 14 d. Parent/child attachment relationships should be maintained;
- 15 e. All image files should have a minimum resolution of 300 dpi and meet
16 commonly accepted production standards to ensure that the image file is
17 reliable and authentic;
- 18 f. The metadata fields should include: DocID, EndDoc, Document Date,
19 Sent Date (for email), File Name, Email Subject, File Type or File
20 Extension, Email To, Email From, Email CC, Author, Link to native file,
21 Begattach/Endattach or attachrange, File Extension, MD5 Hash, and
22 Custodian;
- 23 g. PowerPoint and Excel documents should be produced in native format
24 with all metadata preserved, including speaker notes. Spreadsheets
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1 created with other software should be produced in a comma delimited
2 format capable of being opened in Excel;

3 h. All hard copy documents for which native electronics files never existed,
4 no longer exist, or are not reasonably accessible also should be produced
5 in single TIFF format. This includes, but is not limited to, scanned
6 images of those documents which contain unique information after they
7 were printed out, such as paper documents containing handwriting,
8 signatures, marginalia, drawings, annotations, highlighting, and
9 redactions. All scanned documents should be kept as they are in regular
10 course of business or in the alternative provide information identifying
11 the custodian for each document; and

12 i. Audio, video, or other recorded information shall be provided separately
13 on a DVD or other storage device capable of being played on Windows
14 in a .wav or .mpeg format.

15 7. If any document responsive to these requests is no longer in your possession,
16 custody, or control, state (i) what was done with the document; (ii) the identity and contact
17 information of the current custodian of the document; (iii) the reason for the transfer or
18 disposition of the document; and (iv) the identity and contact information of the person who
19 made the decision to transfer or dispose of the document.

20 8. If any document request cannot be answered fully, please provide as full an
21 answer as possible, with a complete statement of the reason for the inability to fully respond.

22 9. The propounding party acknowledges the possibility that you may object to a
23 particular document request as vague or burdensome. A party cannot always determine in
24 advance which requests might genuinely be vague or unduly burdensome to the opposing
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1 party. It is anticipated that you will respond to all Requests for Production to the best of your
2 ability and in good faith, preserving any bona fide objections if necessary. It is further
3 anticipated, and good practice would certainly dictate, that you will promptly attempt to obtain
4 clarification regarding requests from the undersigned (who stand ready and willing to provide
5 any such clarity) if the facts of the particular situation so require. When in doubt, the request
6 should be interpreted consistent with their common meaning and standard English dictionary.

7 10. These requests are continuing and, to the full extent required under CR 26(e),
8 you must seasonably supplement your responses upon the discovery of new or additional
9 information.

10 **DEFINITIONS**

11 As used herein:

12 1. “Document(s)” means the original or any non-identical copies of all written,
13 recorded, graphic material and all electronic data of every kind, whether prepared by you or
14 by any other person, including drafts, that is in your possession, custody, or control, including
15 but not limited to: memoranda, reports, letters, telegrams, and other communications recorded
16 in any form or medium; notes, minutes, and transcripts of conferences, meetings and telephone
17 or other communications; contracts and other agreements; checks, check registers, statements,
18 ledgers, and other records of financial matters or commercial transactions; appointment books,
19 calendars, notebooks, and diaries, including data in PDAs; maps, diagrams, graphs, and charts;
20 plans and specifications; publications; photographs; photocopies; microfilm; and other copies
21 or reproductions; computer printouts, tallies, tabulations, and summaries of sales or bids; and
22 all file folders, file tabs, folder tabs, mailing envelopes, facsimile transmission cover sheets,
23 and any other proof or indicia of mailing (if applicable) associated with each original. The
24 term “document” includes spreadsheets, as well as underlying cell formulae and other codes.
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1 The term “document” also includes electronic mail messages and other documents and data
2 stored in, or accessible through, computer or other information retrieval systems, such as
3 personal computers, workstations, minicomputers, personal data assistants, archival voice
4 storage systems, group and collaborative tools, electronic messaging devices, portable or
5 removable storage media, mainframes, servers, backup disks and tapes, archive disks and
6 tapes, and other forms of online or offline storage, whether on or off of your premises. The
7 term “document” includes all data (including metadata, embedded, hidden and other
8 bibliographic or historical data describing or relating to documents created, revised, or
9 distributed on computer systems) stored in electronic form or accessible through computer or
10 other information retrieval systems, together with instructions and all other materials necessary
11 to use or interpret this data. Unless specifically requested, the term “document” excludes non-
12 electronic forms of invoices, bills of lading, purchase orders, customs declarations, and other
13 similar documents of a purely transactional nature. The reference to specific types, categories,
14 or formats of documents in any specific Request for Production in no way limits or diminishes
15 the scope of the term “document” for purposes of the request.

16 2. “Communication(s)” means any oral or written expression, disclosure, transfer,
17 transmission, or exchange of information or any nonverbal conduct of a person intended by
18 that person to be a substitute for an oral or written expression, disclosure, transfer,
19 transmission, or exchange of information, in whatever form, by whatever means, including,
20 but not limited to, oral, written, face-to-face, email, telephone, facsimile, electronic, text
21 messages, voicemail, postal mail, personal delivery, or otherwise.

22 3. “Identify” means:
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- 1 a. In the case of a person other than a natural person, its legally registered
2 name, the address of its principal place of business, its telephone number,
3 and the name of its chief executive officer;
4 b. In the case of a natural person, his or her full name (including middle
5 name), home address and telephone number, business address and phone
6 number, last known cellular or mobile telephone number(s), their last
7 known employer, the positions held by each person during the
8 discoverable period, and the dates of tenure in each such position; and
9 c. In the case of a communication, its date, its type (e.g., telephone
10 conversation, letter, electronic mail, or meeting), the place where it
11 occurred, the identity of the persons who made it, the identity of the
12 persons who received it or who were present when it was made, and the
13 subject matter discussed.

14 4. “Relating to” or “relate to” or “regarding” means directly or indirectly refer or
15 pertain to, discuss, describe, reflect, contain, examine, analyze, study, report on, comment on,
16 evidence, constitute, show, consider, recommend, concern, record, or set forth, in whole or in
17 part.

18 5. “You” or “Your” or “First Fed” means First Fed Bank and/or First Northwest
19 Bancorp and or any of their partners, owners, members, agents, affiliates, subsidiaries, parents,
20 servants, employees, officers, successors, licensees, partners, contractors (including, but not
21 limited to, Turning Point), and assigns, and all persons acting in concert or participation with
22 each or any of them or on any of their behalf.

23 6. “Houk” or “Larry Houk” means Defendant Larry Houk and/or Northwest
24 Financial Services, LLC, and/or any person or entity acting on their behalf.
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1 7. “Nooney” or “Kevin Nooney” means Defendant Kevin Nooney and/or any
2 person or entity acting on his behalf.

3 8. “Unibank” means UniBank and/or its partners, owners, members, agents,
4 affiliates, subsidiaries, parents, servants, employees, officers, successors, licensees, partners,
5 contractors, and assigns, and all persons acting in concert or participation with each or any of
6 them or on their behalf.

7 9. “Turning Point” means TurningPointe LLC d/b/a Turning Point Strategic
8 Advisors and/or any of its partners, owners, members, agents, affiliates, subsidiaries, parents,
9 servants, employees, officers, successors, licensees, partners, contractors, and assigns, and all
10 persons acting in concern or participation with each or any of them or on their behalf

11 10. The term “Wear” refers to Ryan Wear and/or the business known as
12 “WaterStation Technology,” and any of its present and former affiliates, subsidiaries, agents,
13 employees, servants, attorneys, representatives, and any and all persons acting or who have
14 acted for or on their behalf, including, without limitation, Kevin Nooney or Larry Houk.

15 **REQUESTS FOR PRODUCTION**

16 **REQUEST FOR PRODUCTION NO. 1:** Produce all documents and communications sent
17 to or received from Wear referencing and/or related to any of the following:

- 18 a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or
19 evaluation of such inquiries and/or applications;
- 20 b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities
21 relating to any such loans;
- 22 c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual
23 or potential investor in Wear, including but not limited to the Plaintiffs in this action to
24 whom First Fed issued loans;
- 25

- 1 d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-
2 closing due diligence activities relating to any such loans;
3 e) Information regarding any Wear-related collateral, including, without limitation, real
4 estate, water vending machines, leases, and/or equipment lists;
5 f) Referrals to or from Wear;
6 g) Commissions or compensation paid to Houk;
7 h) Any and all agreements or loan programs with Wear, including without limitation credit
8 referral and/or enhancement agreements, and all drafts thereof;
9 i) Investments in Wear;
10 j) Potential investors in Wear;
11 k) The qualifications and/or financial means of investors in Wear;
12 l) Wear's business and/or financial information;
13 m) Wear's business practices, credit worthiness, and/or financial condition; and/or
14 n) Wear's solvency and/or ability to satisfy obligations.

15 **RESPONSE:**

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17 **REQUEST FOR PRODUCTION NO. 2:** Produce all documents and communications sent
18 to or received from Larry Houk referencing and/or relating to any of the following:

- 19 a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or
20 evaluation of such inquiries and/or applications;
21 b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities
22 relating to any such loans;
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- 1 c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual
2 or potential investor in Wear, including but not limited to the Plaintiffs in this action to
3 whom First Fed issued loans;
4
5 d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-
6 closing due diligence activities relating to any such loans;
7
8 e) Information regarding any Wear-related collateral, including, without limitation, real
9 estate, water vending machines, leases, and/or equipment lists;
10
11 f) Referrals to or from Wear;
12
13 g) Commissions or compensation paid to Houk;
14
15 h) Any and all agreements or loan programs with Wear, including without limitation credit
16 referral and/or enhancement agreements, and all drafts thereof;
17
18 i) Investments in Wear;
19
20 j) Potential investors in Wear;
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22 k) The qualifications and/or financial means of investors in Wear;
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24 l) Wear's business and/or financial information;
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m) Wear's business practices, credit worthiness, and/or financial condition; and/or
n) Wear's solvency and/or ability to satisfy obligations.

RESPONSE:

REQUEST FOR PRODUCTION NO. 3: Produce all documents and communications sent to or received from Kevin Nooney referencing and/or related to any of the following:

- a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or evaluation of such inquiries and/or applications;

- 1 b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities
2 relating to any such loans;
3 c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual
4 or potential investor in Wear, including but not limited to the Plaintiffs in this action to
5 whom First Fed issued loans;
6 d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-
7 closing due diligence activities relating to any such loans;
8 e) Information regarding any Wear-related collateral, including, without limitation, real
9 estate, water vending machines, leases, and/or equipment lists;
10 f) Referrals to or from Wear;
11 g) Commissions or compensation paid to Houk;
12 h) Any and all agreements or loan programs with Wear, including without limitation credit
13 referral and/or enhancement agreements, and all drafts thereof;
14 i) Investments in Wear;
15 j) Potential investors in Wear;
16 k) The qualifications and/or financial means of investors in Wear;
17 l) Wear's business and/or financial information;
18 m) Wear's business practices, credit worthiness, and/or financial condition; and/or
19 n) Wear's solvency and/or ability to satisfy obligations.

20 **RESPONSE:**

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22
23 **REQUEST FOR PRODUCTION NO. 1:** Produce all documents and communications sent
24 to or received from Turning Point referencing and/or related to any of the following:
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- 1 a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or
2 evaluation of such inquiries and/or applications;
3
4 b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities
5 relating to any such loans;
6
7 c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual
8 or potential investor in Wear, including but not limited to the Plaintiffs in this action to
9 whom First Fed issued loans;
10
11 d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-
12 closing due diligence activities relating to any such loans;
13
14 e) Information regarding any Wear-related collateral, including, without limitation, real
15 estate, water vending machines, leases, and/or equipment lists;
16
17 f) Referrals to or from Wear;
18
19 g) Commissions or compensation paid to Houk;
20
21 h) Any and all agreements or loan programs with Wear, including without limitation credit
22 referral and/or enhancement agreements, and all drafts thereof;
23
24 i) Investments in Wear;
25
j) Potential investors in Wear;
k) The qualifications and/or financial means of investors in Wear;
l) Wear's business and/or financial information;
m) Wear's business practices, credit worthiness, and/or financial condition; and/or
n) Wear's solvency and/or ability to satisfy obligations.

RESPONSE:

REQUEST FOR PRODUCTION NO. 2: Produce all documents and communications sent to or received from Unibank referencing and/or relating to any of the following:

- a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or evaluation of such inquiries and/or applications;
- b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities relating to any such loans;
- c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual or potential investor in Wear, including but not limited to the Plaintiffs in this action to whom First Fed issued loans;
- d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-closing due diligence activities relating to any such loans;
- e) Information regarding any Wear-related collateral, including, without limitation, real estate, water vending machines, leases, and/or equipment lists;
- f) Referrals to or from Wear;
- g) Commissions or compensation paid to Houk;
- h) Any and all agreements or loan programs with Wear, including without limitation credit referral and/or enhancement agreements, and all drafts thereof;
- i) Investments in Wear;
- j) Potential investors in Wear;
- k) The qualifications and/or financial means of investors in Wear;
- l) Wear's business and/or financial information;
- m) Wear's business practices, credit worthiness, and/or financial condition; and/or
- n) Wear's solvency and/or ability to satisfy obligations.

RESPONSE:

REQUEST FOR PRODUCTION NO. 6: To the extent not produced in response to previous requests, produce all documents and communications with any party or third party (other than your legal counsel) referencing and/or related to any of the following:

- a) Loan inquiries or applications submitted by Wear and your review, investigation, and/or evaluation of such inquiries and/or applications;
- b) Loans to Wear and/or any underwriting or pre- or post-closing due diligence activities relating to any such loans;
- c) Loan inquiries, applications, and/or information submitted by or on behalf of any actual or potential investor in Wear, including but not limited to the Plaintiffs in this action to whom First Fed issued loans;
- d) Loans to Plaintiffs or any other investor in Wear and/or any underwriting or pre- or post-closing due diligence activities relating to any such loans;
- e) Information regarding any Wear-related collateral, including, without limitation, real estate, water vending machines, leases, and/or equipment lists;
- f) Referrals to or from Wear;
- g) Commissions or compensation paid to Houk;
- h) Any and all agreements or loan programs with Wear, including without limitation credit referral and/or enhancement agreements, and all drafts thereof;
- i) Investments in Wear;
- j) Potential investors in Wear;
- k) The qualifications and/or financial means of investors in Wear;
- l) Wear's business and/or financial information;
- m) Wear's business practices, credit worthiness, and/or financial condition; and/or
- n) Wear's solvency and/or ability to satisfy obligations.

1 **RESPONSE:**

2
3 **REQUEST FOR PRODUCTION NO. 7:** Produce all documents and communications
4 referencing and/or related to whether any loans to Wear, loans to fund any investor's investment
5 in WST, and/or loan programs or portfolio related to Wear comply with and/or violate U.S.
6 Small Business Administration ("SBA") rules, policies, guidelines, regulations and/or
7 standards.

8 **RESPONSE:**

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10 **REQUEST FOR PRODUCTION NO. 8:** Produce all documents and communications
11 referencing and/or related to whether any loans to Wear, loans to fund any investor's investment
12 in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate Federal
13 Deposit Insurance ("FDIC") rules, policies, guidelines, regulations and/or standards.

14 **RESPONSE:**

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16 **REQUEST FOR PRODUCTION NO. 9:** Produce all documents and communications
17 referencing and/or related to whether any loans to Wear, loans to fund any investor's investment
18 in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate
19 Washington State Department of Financial Institutions ("DFI") rules, policies, guidelines,
20 regulations and/or standards.

21 **RESPONSE:**

22
23 **REQUEST FOR PRODUCTION NO. 10:** Produce all documents and communications
24 referencing and/or related to whether any loans to Wear, loans to fund any investor's investment
25

1 in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate your
2 internal rules, policies, guidelines, regulations and/or standards.

3 **RESPONSE:**
4

5 **REQUEST FOR PRODUCTION NO. 11:** Produce all documents and communications sent
6 to or received from the SBA, FDIC, or DFI, referencing and/or related to Wear and/or loans to
7 Wear investors.

8 **RESPONSE:**
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10 **REQUEST FOR PRODUCTION NO. 12:** Produce all documents and communications sent
11 to or received from FDIC referencing and/or related to Wear and or loans to Wear investors.

12 **RESPONSE:**
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14 **REQUEST FOR PRODUCTION NO. 13:** Produce all documents and communications sent
15 to or received from DFI referencing and/or related to Wear and or loans to Wear investors.

16 **RESPONSE:**
17

18 **REQUEST FOR PRODUCTION NO. 14:** To the extent not produced in response to the
19 previous requests stated herein, produce all documents and communications referencing and/or
20 related to any supervision, evaluation, and/or investigation conducted by DFI, SBA, FDIC,
21 and/or any other state or federal agency or regulatory entity referencing and/or related to Wear
22 and or loans to Wear investors.

23 **RESPONSE:**
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1 **REQUEST FOR PRODUCTION NO. 15:** Produce all commercial lending rules, policies,
2 guidance, and/or procedures regarding loan eligibility, loan products, loan staff and loan
3 committees, loan underwriting and/or due diligence, transactions with brokers, loan approval,
4 loan closing, loan monitoring, portfolio management, delinquency, loan foreclosure and/or loan
5 write-offs.

6 **RESPONSE:**

7
8 **REQUEST FOR PRODUCTION NO. 16:** Produce all documents and communications
9 related to secured and unsecured lending authorities of each employee who worked on or
10 assisted with loans related in any way to WST, including, without limitation, Kasi O'Leary,
11 Kevin McDaniel, and/or Matt Deines.

12 **RESPONSE:**

13
14 **REQUEST FOR PRODUCTION NO. 17:** Produce all personnel files for each employee
15 who worked on or assisted with loans related to Wear, including, without limitation, Kasi
16 O'Leary, Kevin McDaniel, and/or Matt Deines.

17 **RESPONSE:**

18
19 **REQUEST FOR PRODUCTION NO. 18:** Produce all documents and communications
20 reflecting or related to any meeting minutes, resolutions, directives, or any other corporate
21 action or oversight by your directors, governors, board of directors, board of governors, and/or
22 any subcommittee or work group thereof, from January 1, 2019 to present.

23 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 19:** Produce all documents and communications
2 reflecting or related to any meeting minutes, resolutions, directives, or any other corporate
3 action or oversight by your loan committee and/or members of the loan committee, and/or any
4 subcommittee or work group thereof, from January 1, 2019 to present.

5 **RESPONSE:**

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7 **REQUEST FOR PRODUCTION NO. 20:** Produce all documents and communications
8 reflecting or related to any meeting minutes, resolutions, directives, or any other corporate
9 action or oversight by your audit committee and/or members of the audit committee, and/or any
10 subcommittee or work group thereof, from January 1, 2019 to present.

11 **RESPONSE:**

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13 **REQUEST FOR PRODUCTION NO. 21:** Produce all documents and communications
14 reflecting and/or related to any reports or findings of internal or external audits or investigations
15 from January 1, 2019 to present.

16 **RESPONSE:**

17
18 **REQUEST FOR PRODUCTION NO. 22:** To the extent not produced in response to the
19 previous requests stated herein, complete credit and loan files regarding any and all actual or
20 potential investors in Wear, including Plaintiffs to whom you issued loans.

21 **RESPONSE:**

22
23 **REQUEST FOR PRODUCTION NO. 23:** Produce a complete record of payments to Larry
24 Houk and/or Northwest Financial Services LLC from January 1, 2015 to present.
25

1 **RESPONSE:**

2
3 **REQUEST FOR PRODUCTION NO. 24:** To the extent not produced in response to the
4 previous requests stated herein, produce all documents and communications reflecting or
5 related to any contracts and/or agreements with any of the Defendants named herein, including
6 any drafts related thereto.

7 **RESPONSE:**

8
9 **REQUEST FOR PRODUCTION NO. 25:** Produce all account statements, signature cards,
10 wire transfer receipts, deposited items, and/or cancelled checks, regarding Wear.

11 **RESPONSE:**

12
13 **REQUEST FOR PRODUCTION NO. 26:** To the extent not produced in response to the
14 previous requests stated herein, produce all documents and communications reflecting or
15 related to any suspicious activity reports, AML compliance, FinCen compliance, fraud
16 prevention and/or fraud alerts, and/or internal compliance with respect to Wear.

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18 **RESPONSE:**

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20 **REQUEST FOR PRODUCTION NO. 27:** To the extent not produced in response to the
21 previous requests stated herein, produce all documents and communications reflecting or
22 related to any contracts and/or agreements with any of the Plaintiffs named herein to whom you
23 issued a loan, including any drafts related thereto.

24 **RESPONSE:**

1 **REQUEST FOR PRODUCTION NO. 28:** To the extent not produced in response to the
2 previous requests stated herein, produce all communications referencing or related to any of the
3 Defendants named herein.

4 **RESPONSE:**
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6 **REQUEST FOR PRODUCTION NO. 29:** Produce all documents and communications
7 referencing and/or related to loans or credit to Wear, including, but not limited to, any
8 applications for the loans, the approval, issuance, and/or administration of such loans, and/or
9 the default, workout and/or collateralization of the loans.

10 **RESPONSE:**
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12 **REQUEST FOR PRODUCTION NO. 30:** Produce all documents and communications
13 referencing and/or related to whether any loans to Wear, loans to fund any investor's investment
14 in Wear, and/or loan programs or portfolio related to Wear comply with and/or violate industry
15 rules, policies, guidelines, regulations and/or standards.

16 **RESPONSE:**
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1 DATED this 9th day of September, 2024.

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